

May 25, 2023

*Via Electronic Delivery:*  
*Nickel.Brian@epa.gov*

Ms. Susan Poulsom and Mr. Brian Nickel  
Water Division, NPDES Permitting Section  
US EPA Region 10  
1200 Sixth Avenue, Suite 155  
Seattle, Washington 98101

Subject: Public Notice Comments: NPDES Permit No. WA0050202  
Washington Beef, LLC - Toppenish Plant

Dear Ms. Poulsom and Mr. Nickel:

I am writing in my own personal capacity to express concern over the EPA's recently issued National Pollutant Discharge Elimination System (NPDES) permit for Washington Beef's processing plant in Toppenish, WA.

As an Assistant Professor in Meat Science at Washington State University in Pullman, WA, I have worked very closely with Washington Beef for the entirety of my time in this position. The collaboration with Washington Beef has strengthened our program for the benefit of our students and partners. The company has eagerly welcomed students and industry groups to their plant for tours to educate them about the business and their role in sustainable beef production.

Through this experience, I have personally witnessed Washington Beef's commitment to protecting the local environment. They utilize industry-leading best practices at the Toppenish plant and have a sterling track record that is free of any cited violations justifying the significant changes being proposed.

I have also seen the enormous positive impact Washington Beef has on our region and throughout the State of Washington. They are an important employer and economic development driver that would be difficult, if not impossible, to replace for the community of Toppenish and surrounding areas.

I am concerned that the environmental stewardship and economic development currently being sustained at Washington Beef will be put at risk by imposing regulatory standards that are both unachievable and unnecessary. I support the EPA's mission, but sweeping changes such as those being proposed in the new NPDES permit should be reserved for cleaning up bad behavior in the industry, not imposed on good actors who are valued neighbors and community partners, especially when those changes were developed outside of the normal federal rulemaking process.

I urge you to reconsider the draft NPDES Permit and work with Washington Beef to identify more sustainable solutions that allow the EPA to accomplish its mission while also preserving the economic and social benefits that the company provides to our community, as well as their ongoing investments to reduce impacts and improve the environment. And selfishly, I want to make sure that the Toppenish plant is in operation for years to come given the strong existing partnership and benefit that it provides to my students.

Thank you for the opportunity to submit these comments relating to Washington Beef's NPDES Permit, which are intended to be part of the Administrative Record. Please consider my views on this important issue.

Sincerely,



Blake Foraker, Ph.D.  
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